

NEW YORK TAXI WORKERS ALLIANCE

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October 15, 2021

By CM-ECF

Hon. LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Islam et al. v. Cuomo et al.*, 20-CV-2328(LDH)(CLP)
Letter Motion for Leave to File a Reply

Dear Judge DeArcy Hall:

Undersigned counsel represents Plaintiffs in the above-captioned case. We submit this letter to respectfully request the Court's permission to file a reply to Defendants' October 12, 2021 reply to Plaintiffs' motion to renew their January 5, 2021 letter motion for compliance. Defendants incorrectly asserted that Plaintiffs have not notified the DOL of app-based FHV drivers who are impacted by the retroactive benefit issue since June 30, 2021. Dkt. 74, at 3. Plaintiffs seek leave to respond to correct this assertion and clarify the scope of the ongoing issue as identified by Plaintiff New York Taxi Workers Alliance.

Accordingly, Plaintiffs respectfully request leave to file a reply of no more than two pages, in a time determined by the Court. We thank the Court for your attention to this matter.

Respectfully Submitted,

/s/ Zubin Soleimany
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cc: Counsel of Record (via CM/ECF)